

NOTA: LEGITIMADAS FIRMAS EN LOS TÉRMINOS INDICADOS  
EN EL TESTIMONIO POR MI AUTORIZADO AL FINAL  
DEL DOCUMENTO.

**EXHIBIT A**

**(Ordinary Course Professional Affidavit)**



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EN EL TESTIMONIO POR MI AUTORIZADO AL ...  
DEL DOCUMENTO.



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

**LEHMAN BROTHERS HOLDINGS INC., et al.,**

### Debtors.

Chapter 11 Case No.

**08-13555 (JMP)**

**(Jointly Administered)**

**AFFIDAVIT AND DISCLOSURE STATEMENT OF JOSÉ MARÍA NÚÑEZ GALLEGO,  
ON BEHALF OF NBP CLEMS ABOGADOS Y CONSULTORES S.L.P.**

COUNTRY OF SPAIN

)

) SS:

CITY OF VIGO, IN THE PROVINCE OF PONTEVEDRA

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José María Núñez Gallego, being duly sworn, upon his oath, deposes and says:

1. I am a director of N.B.P. Clems Abogados y Consultores S.L.P., located at Rúa Colon 33-35, 4ºA, Vigo (Pontevedra), Spain (the “Firm”).
2. Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the “Debtors” and, collectively with their non-debtor affiliates, “Lehman”), have requested that the Firm provide legal services to the Debtors, and the Firm has consented to provide such services.
3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors’ chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these

chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

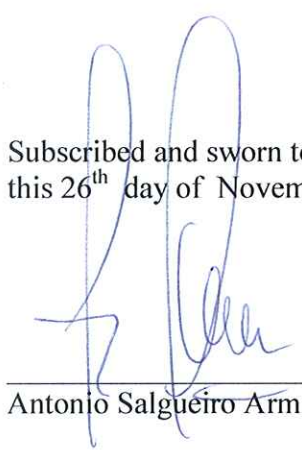
4. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

5. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates.

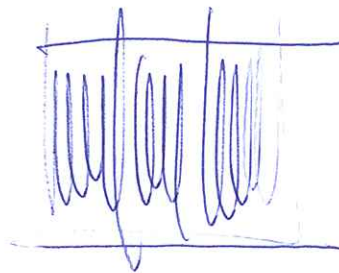
6. The Debtors owe the Firm €0 for prepetition services.

7. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

Subscribed and sworn to before me  
this 26<sup>th</sup> day of November, 2008

  
Antonio Salgueiro Armada, Notary Public, of the Illustrious College of Notaries of Vigo

By: José María Núñez Gallego



Yo, ANTONIO A. SALGUEIRO ARMADA, Notario del Ilustre Colegio de Galicia, con residencia en Vigo, doy fe que la firma que antecede en el presente documento, compuesto de tres folios de papel común mecanográficamente escritos por su anverso, en todos los cuales pongo el sello de mi notaría, es propia de DON JOSÉ MARÍA NÚÑEZ GALLEG0, por haber sido puesta por dicho señor en mi presencia, habiéndome asegurado yo, notario, de la identidad de dicha persona y de la representación alegada por la misma de la entidad "**NBP CLEMS ABOGADOS Y CONSULTORES, SOCIEDAD LIMITADA PROFESIONAL**", del conocimiento de su contenido y de que dicho señor quiere que surta los efectos que sean aplicables con arreglo a la legislación de los **ESTADOS UNIDOS DE NORTEAMERICA**, todo ello según acta por mí autorizada, el día 26 de noviembre de 2008, número 1.718 de mi protocolo.- DOY FE en Vigo, a veintiséis de noviembre de dos mil ocho.=



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**EXHIBIT B**

**(Retention Questionnaire)**





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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11 Case No.  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
: :  
-----X

**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN  
BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively,  
the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Jennifer Sapp  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as  
appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

N.B.P. Clems Abogados y Consultores S.L.P.

Rúa Colón 33-35, 4º AB - 36201

Vigo, Pontevedra

Spain

2. Date of retention: 30 September 2008

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3. Type of services provided (accounting, legal, etc.):

Legal

4. Brief description of services to be provided:

Filing credit claims on behalf of Lehman Commercial Paper Inc. against  
Martinsa Fadesa and related subsidiaries and companies and providing any  
other Spanish legal advice required by the Debtors.

5. Arrangements for compensation (hourly, contingent, etc.)

Hourly

- (a) Average hourly rate (if applicable):

CLEMS applies the rates approved by the College of Lawyers and  
Barristers of Madrid, which applies gradual Rates depending on  
the nature and sums of claims and actions, with a discount of 40%.  
Apart from those stipulated services, Partners hourly Rates for  
other services are 150€, senior's 60€.

- (b) Estimated average monthly compensation based on prepetition  
retention (if firm was employed prepetition):

N/A

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: None

Date claim arose: N/A

Source of Claim: N/A



7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:

Name: N/A

Status: N/A

Amount of Claim: \$ \_\_\_\_\_

Date claim arose: \_\_\_\_\_

Source of claim: \_\_\_\_\_

8. Stock of the Debtors currently held by the firm:

Kind of shares: N/A

No. of shares: N/A

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: N/A

Status: N/A

Kind of shares: N/A

No. of shares: N/A

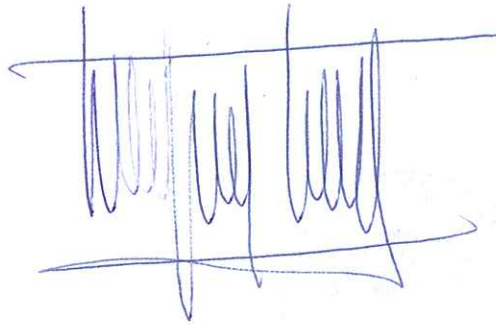
10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

N/A



11. Name of individual completing this form:

José María Núñez Gallego

A handwritten signature in blue ink, consisting of several vertical, wavy strokes, enclosed within a rectangular frame defined by two horizontal lines.

Yo, ANTONIO A. SALGUEIRO ARMADA, Notario del Ilustre Colegio de Galicia, con residencia en Vigo, doy fe que la firma que antecede en el presente documento, compuesto de cinco folios de papel común mecanográficamente escritos por su anverso, en todos los cuales pongo el sello de mi notaría, es propia de DON JOSÉ MARÍA NÚÑEZ GALLEG0, por haber sido puesta por dicho señor en mi presencia, habiéndome asegurado yo, notario, de la identidad de dicha persona y de la representación alegada por la misma de la entidad "**NBP CLEMS ABOGADOS Y CONSULTORES, SOCIEDAD LIMITADA PROFESIONAL**", del conocimiento de su contenido y de que dicho señor quiere que surta los efectos que sean aplicables con arreglo a la legislación de los **ESTADOS UNIDOS DE NORTEAMERICA**, todo ello según acta por mí autorizada, el día 26 de noviembre de 2008, número 1.718 de mi protocolo.- DOY FE en Vigo, a veintiséis de noviembre de dos mil ocho.=

